

REMARKS

Claims 1-7 are all the claims pending in the application. Claims 1, 2, 6 and 7 have been amended and new claims 8 and 9 have been added to more completely claim the invention.

With respect to claim 8, support for Step i) can be found in the passages at page 3, line 17 to page 4, line 4 and at page 7, lines 18-24 of the original description. Support for Step ii) can be found in the passage at page 7, lines 18-24 of the original description. Support for Step iii) can be found in the passage at page 4, lines 5-17 of the original description. Support for Step iv) can be found in the passage at page 4, lines 18-21 of the original description (please note that the recognition means 8 are also operative for receiving and processing vocal messages emitted by the loudspeaker 6, as explained at page 7, line 33 to page 8, line 7 of the original description). Support for Step v) and the wherein clause of the claim can be found in the passages at page 4, line 21 to page 5, line 1, and at page 8, lines 12-17 of the original description.

Claim 9 is based on the passage from page 7, line 33, to page 8, line 7, of the original description.

Turning to the office Action, the Examiner has rejected claims 1, 2, 6 and 7 under § 112 (second paragraph) as being indefinite. Applicants thank the Examiner for carefully reviewing the claims and for indicating those aspects of the claims which are deemed to be indefinite. Applicants have amended the claims with the Examiner's comments in mind. Thus, it is respectfully submitted that the § 112 (second paragraph) rejection has been overcome.

Claims 1, 3, 4, 6 and 7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over DeVito (U.S. Patent No. 6,254,536) in view of Moore (U.S. Patent No. 5,749,324), Plotkin (U.S. Patent No. 6,178,923) and Naritoku, et al. (U.S. Patent No. 6,556,868). Further, the Examiner has rejected claims 2 and 5 under 35 U.S.C. § 103(a) as being unpatentable over DeVito in view of Moore, Plotkin and Naritoku, et al. and further in view of Yamamoto (U.S. Patent No. 5,790,033). For the following reasons Applicants respectfully traverse the rejections.

First, Applicants note that the § 103 rejection of independent claim 1 is based on the combination of four separate references, which alone is enough to call into question the § 103 rejection of independent claim 1.

Beyond that, Applicants respectfully submit that the prior art does not teach or suggest the voice connection system recited in claim 1. More specifically, Applicants submit that the prior art does not teach or suggest a system by which a human is able to communicate with an animal by virtue of the claimed voice recognition means and a pulse-generating means recited in claim 1. Referring to claim 1, claim 1 recites “voice recognition means operative for sending to the processing means signals representing the content of voice messages other by a human user.” Further, claim 1 recites “pulse-generating means, which receive from said processing means said signals representing the content of the voice messages uttered by the human user, and which send to the animals brain corresponding pulses.” The prior art does not teach or suggest this aspect of the invention.

In the rejection, the Examiner contends that Plotkin teaches the claimed voice recognition means. In particular, the Examiner states “voice recognition would necessarily need to be performed in order to convert the voice messages into signals”. Office Action at page 4. However, nowhere is it disclosed in Plotkin that voice messages are converted into signals. Rather, Plotkin is merely directed to a system and method for making animals appear to talk. As disclosed in the Abstract, pre-recorded messages are stored in the memory such that a user is able to selectively output the pre-recorded messages from the memory to the speaker. Clearly, there is no voice recognition system in Plotkin nor is there any necessity in Plotkin for a voice recognition system. Certainly, there is no teaching or suggestion in Plotkin of communicating words spoken by a human to an animal, as in the present invention.

In more detail, the system according to Plotkin includes a speaker, mounted on a collar worn by the animal, and a memory apt to store a plurality of pre-recorded messages. These pre-recorded messages may be generic phrases to be “spoken” by all types of animals or may be messages which are based on the characteristics of a particular animal. Using a selection circuit, a user is able to selectively output the pre-recorded messages from the memory to the speaker, thereby making the animal appear to talk.

However, Plotkin does NOT relate to a voice connection system between humans and animals comprising “*voice recognition means operative for sending to the processing means signals representing the content of voice messages uttered by a human user*” as recited in claim 1.

In fact, the system disclosed in Plotkin comprises (see column 2, lines 30-34) a “... *selection circuit 20 that permits a user to make selections including selections of a particular one of the pre-recorded spoken messages ...*” in order to selectively output the pre-recorded messages from the memory to the speaker, thereby making the animal appear to talk.

Therefore, Applicants respectfully but strongly point out that it is not true that in Plotkin “*voice recognition would necessarily need to be performed in order to convert the voice messages into signals*”, like the Examiner says at page 4 of the Office action, because in Plotkin the voice messages uttered by a human user are NOT converted into signals representing the content of said messages.

In Plotkin there is not disclosed nor there is any necessity for a “voice recognition system”, because Plotkin is merely directed to a system and a method for making animals appear to talk on the basis of a selection made by the user of buttons or keys present on a selection circuit (20).

Please also note that the system according to Plotkin may comprise (from col. 1, line 65, to column 2, line 3; column 5, lines 15-27) one or more sensors for sensing parameters such as, for example, the air temperature; in this case, the messages “spoken” by the animal may be correspondent to the sensed parameter, following a selection of the user. However, these provisions are totally irrelevant with respect to the solution claimed in the subject application, because they do not relate to a “*voice recognition means operative for sending to the processing means signals representing the content of voice messages uttered by a human user*”.

Further, the Examiner asserts that Naritoku, et al. discloses the claimed pulse generating means discussed above. However, Applicants disagree. More specifically, claim 1 recites that “pulse-generating means, which receive from said processing means said signals representing the content of the voice messages uttered by the human user, and which send to the animals brain corresponding pulses. In contrast, Naritoku, et al. is merely directed to a method of improving memory and learning in humans and animals by nerve stimulation of the animal. These methods comprise selecting an appropriate human or animal subject and applying to the subject’s vagus nerve an electrical stimulation signal having parameter values effective in modulating the electrical activity of the vagus nerve in a manner so as to modulate the activity of pre-selected portions of the brain. However, *this nerve stimulation does not represent the content of voice messages uttered by a human user*, as claim 1 recites.

In short, the Examiner has failed to cite a single reference which teaches or suggests a system for communicating voice commands from a human to an animal using the claimed voice recognition means and the related pulse-generating means.

Based on the foregoing, Applicants respectfully submit that independent claim 1 patentably distinguishes over the cited art. Further, it is submitted that dependent claims are patentable based on their dependencies from claim 1 as are new claims 8 and 9 for the reasons discussed above. Thus, it is respectfully submitted that all claims pending in the application are allowable. It is therefore respectfully requested that the application be passed to issue at the earliest possible convenience. If any points remain in issue which the Examiner feels may be

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best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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CUSTOMER NUMBER

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Respectfully submitted,


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